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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Estados Unidos Mexicanos,

Plaintiff

vs.

Diamondback Shooting Sports, Inc.,
et al.,

Defendants

**DECLARATION OF YAACOV
(JAKE) MEISELES IN SUPPORT OF
PLAINTIFF'S MOTION TO COMPEL**

NO. 4:22-cv-00472-TUC-RM

**DECLARATION OF YAACOV (JAKE) MEISELES IN SUPPORT OF
PLAINTIFF'S MOTION TO COMPEL**

I, Yaacov (Jake) Meiseles, hereby declare as follows:

1. I am a Senior Staff Attorney at Global Action on Gun Violence. I make this declaration in support of Plaintiff's Motion to Compel. Except as otherwise stated, I have personal knowledge of the matters set forth herein and will testify thereto if called upon to do so.
2. Exhibit 1 is a true and accurate copy of Plaintiff's First Set of Requests for Production of Documents on all Defendants.

- 1 3. Exhibit 2 is a true and accurate copy of Defendant Diamondback Shooting
2 Sports, Inc.'s July 24, 2024, Responses and Objections to Plaintiff's First Set
3 of Requests for Production of Documents.
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- 5 4. Exhibit 3 is a true and accurate copy of Defendant SnG Tactical, LLC's July
6 24, 2024, Responses and Objections to Plaintiff's First Set of Requests for
7 Production of Documents.
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- 9 5. Exhibit 4 is a true and accurate copy of Defendant Loan Prairie, LLC D/B/A
10 The Hub's July 24, 2024, Responses and Objections to Plaintiff's First Set of
11 Requests for Production of Documents.
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- 13 6. Exhibit 5 is a true and accurate copy of Defendant Ammo A-Z, LLC's July 24,
14 2024, Responses and Objections to Plaintiff's First Set of Requests for
15 Production of Documents.
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- 17 7. Exhibit 6 is a true and accurate copy of Defendant Sprague's Sports, Inc.'s July
18 24, 2024, Responses and Objections to Plaintiff's First Set of Requests for
19 Production of Documents.
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- 21 8. Exhibit 7 is a true and accurate copy of Defendant Diamondback Shooting
22 Sports, Inc.'s August 27, 2024, Amended Privilege Log.
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- 24 9. Exhibit 8 is a true and accurate copy of Defendant SnG Tactical, LLC's August
25 27, 2024, Amended Privilege Log.
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- 27 10. Exhibit 9 is a true and accurate copy of Defendant Loan Prairie, LLC D/B/A
28 The Hub's August 27, 2024, Amended Privilege Log.

- 1 11. Exhibit 10 is a true and accurate copy of Defendant Ammo A-Z, LLC's August
2 27, 2024, Amended Privilege Log.
- 3 12. Exhibit 11 is a true and accurate copy of Defendant Sprague's Sports, Inc.'s
4 August 27, 2024, Amended Privilege Log.
- 5 13. Exhibit 12 is a true and accurate copy of Plaintiff's August 5, 2024, response to
6 Defendants' Responses and Objections to Plaintiff's First Set of Requests for
7 Production of Documents.
- 8 14. Exhibit 13 is a true and accurate copy of Defendants' August 27, 2024, reply to
9 Plaintiff's August 5, 2024, response to Defendants' Responses and Objections
10 to Plaintiff's First Set of Requests for Production of Documents.
- 11 15. Exhibit 14 is a true and accurate copy of Memorandum of Intervenor United
12 States of America in *Lopez et al., v. Badger Guns, Inc., et al*, Case No. 10-cv-
13 018530 (Milwaukee County Wis. Mar. 30, 2012).
- 14 16. Exhibit 15 is a true and accurate copy of the transcript of the oral ruling in
15 *Lopez et al., v. Badger Guns, Inc., et al*, Case No. 10-cv-018530 (Milwaukee
16 County Wis. June 25, 2012).
- 17 17. Exhibit 16 is a true and accurate copy of the trial court's order in *Chiapperini*
18 *v. Gander Mountain Company, Inc.*, Index No. 14/5717 (Monroe Co. Sup. Ct.,
19 Sept. 30, 2016).
- 20 18. On September 4, 2024, counsel for the parties met and conferred over the
21 dispute that is the subject of Plaintiff's Motion to Compel.
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1 I declare that the foregoing is true under the penalty of perjury.

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4 Dated: September 13, 2024
5 Brooklyn, New York

6 /s/ Yaacov (Jake) Meiseles
7 Yaacov (Jake) Meiseles
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CERTIFICATE OF SERVICE

I, Ryan O’Neal, hereby certify that this document was filed with the Clerk of the Court via CM/ECF. Those attorneys who are registered with the Court’s electronic filing systems may access this filing through the Court’s CM/ECF system, and notice of this filing will be sent to these parties by operation of the Court’s electronic filings system.

Dated: September 13, 2024

/s/ Ryan O’Neal
Ryan O’Neal